

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA

Case No. 23-CV-24299 MORENO

MARIA ELENA CHAVEZ LETONA,

Plaintiff,

vs.

AMOR DE JESUS, CORP., JOSE
MACHADO, SWEET LIVING FACILITY INC.,
ZELMIRA QUINONEZ, AND AMINTA QUINONEZ,

Defendants

**DEFENDANTS UNOPPOSED MOTION REQUESTING HEARING BE
RESCHEDULED**

COME NOW Defendants, by and through undersigned counsel and files this
Unopposed Motion Requesting the May 23, 2024 Discovery Hearing be rescheduled or moved to
3:30 PM and as grounds therefore states as follows:

1. On or about May 2, 2024, Defendants received Notice of Discovery Hearing being scheduled for May 23, 2024 at 2:30 PM.
2. However, undersigned has a Special Set Motion for Summary Judgment Hearing before Honorable Judge Mark in case *DNP Consulting, LLC et al v. Dagmara Dominguez* (In re: Dagmara Dominguez) with Case No.: 23-01148-RAM, which is scheduled for May 23, 2024 at 2:00 PM.
3. Undersigned is requesting the Discovery Hearing be rescheduled for another day or moved to May 23, 2024 at 3:30 PM.
6. Pursuant to Local Rules, undersigned counsel has asked opposing counsel, Brian H. Pollock, if he had any objections to our motion and he does not oppose.

WHEREFORE, Defendants requests that this Honorable Court grant this unopposed Motion Requesting the May 23, 2024 Discovery Hearing be rescheduled or moved to 3:30 PM and whatever other relief it deems just and reasonable.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing pleading has been electronically filed and served via EM/ECF to all listed persons receiving notice on this 7th day of May 2024.

EMMANUEL PEREZ & ASSOCIATES, P.A.

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By: /s/ EMMANUEL PEREZ

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